Meeting Notes
17-mile RI Comment Review Meeting
June 16, 2016
10:00 AM to 2:00 PM

Participants

Region 2 (R2)	CPG
Jennifer LaPoma	John Connolly (AQEA)
Ed Garland (HDR)	Jim Quadrini (AQEA)
James Wands (HDR)	Raghav Narayanan (AQEA)
Scott Kirchner (CDM)	Rob Law (de maximis)
Keegan Roberts (CDM)	Peter Israelsson (AQEA) – by phone
Aaron Frantz (CDM)	Mike Barbara (mab) – by phone

Opening Remarks – CPG representatives stated that there were several instances where the Region's comments called for revisions and additional work that was inconsistent with the work and level of effort conducted by the Region in its 8-mile ROD and associated FFS-RI. We also stated that there were comments that called for revisions and additional work that are not part of a typical CERCLA RI.

After the CPG's opening remarks, the CDM PM suggested that the 17-mile RI and 8-mile FFS-RI did not need to be consistent because there was an understanding that there would be a different remedial approach taken in the upper river. The CPG stated that the content of RIs should not be driven by some presumption of a remedial outcome. CPG then inquired on whether the Region had some sense of potential remedial outcomes for the upper 9 miles. After opening remarks, attention was directed toward discussing specific groups of comments.

- **Subsurface contamination (comments 109b, 109d, 110)**
  - R2 is interested in understanding contamination as it relates to surface vs. subsurface, fine grained vs. coarse grained sediments, erosional vs. depositional areas, etc.
  - R2 is OK with a discussion of subsurface contamination that has a similar level of detail to that in the FFS RI Report
    - Good example is FFS RI Figure 4-68
    - Refer to R2 (J. LaPoma) email of 5/26 for additional information
  - **Proposed Action:** CPG will revise the subsurface contamination discussion to be comparable to that in the FFS RI Report, including discussion of contamination by deposit and presentation of downcore profiles by river segment
    - The discussion described above will address the R2 comment regarding Core 0555

- **Characteristics and fate/transport of tributaries (comments 139, 192)**
  - R2 is interested in more detailed discussion of nature of contamination in the tributaries, recognizing we will not be able to say anything about extent (R2 will likely identify this as data gap)

- A few ways to address this desire were discussed, including
  - For each tributary, compare sediment type and chemistry in samples collected above the head-of-tide (HOT), within the HOT, and immediate LPR proper
  - Present spatial distribution of sediment type and chemistry for each tributary
  - For Figure 4-13a, for example, use different symbols to differentiate samples collected above the HOT and within the HOT
- **Proposed Action:** CPG to develop/revise figures listed above and add discussion to the report regarding nature of contamination in each tributary (i.e., discuss whether tributaries are possible source to LPR, potential influences of LPR on tributary sediments within the HOT, etc.)

- **CWCM data interpretation (comments 206, 211b, 342)**

- R2 is interested in seeing more detailed presentations of sv-CWCM data to help inform more complete understanding of the "basic data" (e.g., differences between tidal phases, differences with depth and salinity, differences between stations and events, etc.) beyond the aggregated ("rolled up") metrics presented in the CPG RI Report.
  - Existing metrics should be disaggregated further (e.g., Figure 4-4 on an event-specific and surface vs bottom basis; Appendix H Figure 1-1 on an event-specific basis), and additional metrics should be added (e.g., paired data evaluations).
  - If analyzing the data on a more disaggregated basis does not provide insight on transport due to sparse data density, that point should be made in the report before presenting aggregated presentations of the data
  - R2 was in principle amenable to limiting the more detailed metrics to one or two COPCs, to make the report discussion/presentation tractable.

- R2 clarified that the additional metrics suggested in its comments were geared towards better understanding the data (as opposed to evaluating model performance), including the range of the concentrations and any differences noted between tidal cycles.
- **Proposed Action:** CPG will generate additional data evaluations to determine whether the results help better evaluate transport processes, and include a more detailed presentation for one or two COPCs in the revised report.
- **Proposed Action:** R2 will review comments 186, 197 and 198 to understand if they are geared towards data evaluation or modeling

- **Upstream transport (comment 113)**

- R2 indicated it does not like the call-out boxes at the front of each section and will ask to have them deleted from the revised report. If the CPG retains them the Region expects that it will comment and heavily edit them.
- R2 could not provide evidence of transport occurring up to the Dundee Dam, but argued that our statements regarding transport to RM14 could be softened/caveated.
- **Proposed Action:** CPG will modify text to indicate something like "in principle, transport can occur upstream to the Dundee Dam, but there is no evidence to support this."

- Comment 213 was also discussed. The performance of model simulation with historical bathymetry in both the LPR and Newark Bay will be evaluated to support the statement that historically the salt front could have moved further upstream than it does today. R2 expressed concern that the evaluations of Chant et al. (2010) and Canizares et al. (2009) do not adequately account for Newark Bay bathymetry changes.
- **Proposed Action:** CPG will either delete the statement or provide additional support for it (e.g., model simulation). CPG will discuss this further.

- **Work beyond typically Included in an RI (comments 57, 104, 107)**

  - Comment 57: R2 indicated the comment stemmed from a reference the CPG made in the FS regarding work presented in the RI (although that work was not done in the RI)
  - R2 rescinded the request for details and figures related to debris in the revised RI Report, but asked that we simply add one paragraph that indicates that a Side Scan Sonar (SSS) survey was done and debris was identified, and then reference the report – R2 suggested using the discussion in the Portland Harbor RI Report as an example.
  - **Proposed Action:** CPG will review the SSS, review the DQOs of the survey, and determine what text we can add to the revised RI Report (along the lines of the one paragraph described in the bullet above)

  - Comment 104**: Action:** R2 agreed to omit this comment
  - Comment 107: CPG agreed the requested figure modification was simple
  - **Proposed Action:** CPG will revise Figure 3-15 to differentiate samples collected in different geomorphic features (and left bank vs right bank)

- **Additional Discussion**

  - **Action:** R2 is currently reviewing the RI Report and its comments to determine if definitions of low, medium and high are appropriate (per General Comment 1)
  - **Action:** CPG will add table to the BERA that compares sediment contaminant concentrations to various SQGs (per Comment 109c). Any new chemicals that screen through the process will be discussed in the main body of the RI Report.
  - **Action:** CPG will review the report and make sure recurrence interval for Hurricane Irene is consistently reported as 1-in-90 year event (per USGS determination)
  - **Action:** R2 asked the CPG to use the 2008 bathymetry in the bathymetric difference analysis/maps, but caveat the discussion and figures with the uncertainty surrounding the datum (per Comment 99)